

Exhibit P

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
1, 14	"data bus"	<p><u>PROPOSED CONSTRUCTION:</u> "an electrical pathway for transmitting data signals, which is distinct from a control bus"</p> <p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See 2:62-4:24; Figs. 1 and 2 and accompanying text. • See Aug. 2, 2001 Preliminary Amendment at 7; Aug. 20, 2001 Notice of Allowability at 2. <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See <u>The Illustrated Dictionary of Electronics</u>, 7th Ed. (1997): Data bus A conductor or medium over which digital data is transmitted from one place to another within a computer. • One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • NetApp reserves the right to rely on any evidence identified by Sun. 	<p><u>PROPOSED CONSTRUCTION:</u> "a Fibre Channel loop that carries data"</p> <p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> • '984 patent: Col. 3: 2-12; Col. 3: 50- Col. 4:23; Col. 5:1- Col. 6: 28; and FIGs 1 and 2 and associated disclosures. • Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • Sun reserves the right to rely on any evidence identified by NetApp.
1, 14	"control bus"	<p><u>PROPOSED CONSTRUCTION:</u> A bus separate from the data bus that carries control signals.</p>	<p><u>PROPOSED CONSTRUCTION:</u> "a bus separate from the data bus that carries control signals"</p>

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See 2:62-4:24; Figs. 1 and 2 and accompanying text. • See Aug. 2, 2001 Preliminary Amendment at 7; Aug. 20, 2001 Notice of Allowability at 2. <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See <u>The Illustrated Dictionary of Electronics</u>, 7th Ed. (1997): Control bus In a digital computer, the electrical conductors linking the central-processing unit (CPU) control register to the memory circuits. • See <u>IBM Dictionary of Computing</u> (1994): Control bus A bus carrying signals that regulate system operations. • One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • NetApp reserves the right to rely on any evidence identified by Sun. 	<p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> • '984 patent: Col. 3: 29-37; Col. 4:43-67; Col. 7: 40-53; FIG. 1 and FIG. 2 and associated disclosures. • Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • Sun reserves the right to rely on any evidence identified by NetApp.
1, 14	"control signals"	<p><u>PROPOSED CONSTRUCTION:</u> Electronic signals used to control internal or external devices or processes.</p> <p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See 9:66-10:13; 10:55-13:35; Figs. 4 and 5 	<p><u>PROPOSED CONSTRUCTION:</u> "signals controlling the state of storage subsystem devices."</p> <p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> • '984 patent: Col. 4: 44 -67; Col. 11: 66 –

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<p>and accompanying text.</p> <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See <u>Microsoft Press Computer Dictionary</u> (1991): Control signal An electronic signal used to control internal or external devices or processes. • One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • NetApp reserves the right to rely on any evidence identified by Sun. 	<p>13:35; Col. 22: 56-62; Col. 24: 32-46; Col. 11:1-56; and FIGs 2, 4, and 11 and associated disclosures.</p> <ul style="list-style-type: none"> • control signal: an electronic signal used to control internal or external devices or processes. MICROSOFT PRESS COMPUTER DICTIONARY, 3rd Ed. (1997) p. 118. • Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • Sun reserves the right to rely on any evidence identified by NetApp.
1, 14	"status responses"	<p><u>PROPOSED CONSTRUCTION:</u> Information indicating the state of a device.</p> <p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See 9:57-10:13; 10:60-13:35; Figs. 4 and 5 and accompanying text. <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> • See <u>The Illustrated Dictionary of Electronics</u>, 7th Ed. (1997): Status The condition or state of hardware or software, usually represented by a status code. • See <u>Microsoft Press Computer Dictionary</u> (1991): Status Also called state. The condition at a particular time of any of numerous elements of computing – a 	<p><u>PROPOSED CONSTRUCTION:</u> "information indicating the state of a storage subsystem device"</p> <p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> • '984 patent: Col. 9: 7-13; Col. 9: 57-Col. 10: 9; Col. 11:32-37; Col. 1:5-10; Col. 4:18-23; Col. 11: 1-56; Col. 22: 56-62; Col. 24:32-46; and FIGs. 1, 2, and 11 and associated disclosures. • Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • Sun reserves the right to rely on any evidence identified by NetApp.

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<p>device, a communications channel, a network station, a program, a bit, a byte, and so on.</p> <ul style="list-style-type: none"> One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. NetApp reserves the right to rely on any evidence identified by Sun. 	
1, 2, 9, 12, 14, 15, 22, and 25	"host"	<p><u>PROPOSED CONSTRUCTION:</u> General purpose computer.</p> <p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> See 1:43-56; 2:63-3:2; 3:13-19; Fig. 1 and accompanying text. <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> See <u>The Illustrated Dictionary of Electronics</u>, 7th Ed. (1997): Host A programmable computer that gathers and stores the information from all of the data-entry terminals in a system. See <u>IBM Dictionary of Computing</u> (1994): Host processor (1) A processor that controls all or part of a user application network. ... (6) Synonymous with host computer. Host computer (2) The primary or controlling computer in a multiple computer installation. 	<p><u>PROPOSED CONSTRUCTION:</u> Sun contends this term does not require construction because the term is clear on its face.</p> <p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> '984 patent at Abstract, 1:6-9, 38-67; Col. 2:1-3, 61-62; Fig. 1 and associated disclosure. Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. Sun reserves the right to rely on any evidence identified by NetApp.

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<ul style="list-style-type: none"> • See <u>Microsoft Press Computer Dictionary</u> (1991): Host The main computer in a system of computers or terminals connected by communications links. • One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • NetApp reserves the right to rely on any evidence identified by Sun. 	
15	"disconnect"/"disconnects"	<p>PROPOSED CONSTRUCTION: To break a connection, physically or electrically.</p> <p>INTRINSIC EVIDENCE</p> <ul style="list-style-type: none"> • See 4:40-44; 5:42-6:28; Figs. 2 and 3 and accompanying text. <p>EXTRINSIC EVIDENCE</p> <ul style="list-style-type: none"> • See <u>The Illustrated Dictionary of Electronics</u>, 7th Ed. (1997): Disconnect 1. To separate leads or connections, thereby interrupting a circuit. ... 3. To open a switch or relay. • See <u>IBM Dictionary of Computing</u> (1994): Disconnect (2) To break a connection, physically or electrically. • One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in 	<p>PROPOSED CONSTRUCTION: Sun contends this term does not require construction because the term is clear on its face. However, if the Court decides to construe this term, the term should be construed to mean: "stop data transfer."</p> <p>EVIDENCE:</p> <ul style="list-style-type: none"> • '984 patent: Abstract; Col. 1: 48-66; col. 4: 38-37; col. 6: 45-65; col. 22:56-62; col. 24:32-46; and FIGs 2 and 11 and associated disclosures. • Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. • Sun reserves the right to rely on any evidence identified by NetApp.

U.S. Patent No. 6,356,984			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<p>the '984 patent.</p> <ul style="list-style-type: none"> NetApp reserves the right to rely on any evidence identified by Sun. 	
22	"attention command control signal"	<p><u>PROPOSED CONSTRUCTION:</u> A control signal that requests a status response.</p> <p><u>INTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> See 9:66-10:13; 10:60-13:35; 22:52-56; Figs. 4 and 5 and accompanying text. <p><u>EXTRINSIC EVIDENCE</u></p> <ul style="list-style-type: none"> One or more experts may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. NetApp reserves the right to rely on any evidence identified by Sun. 	<p><u>PROPOSED CONSTRUCTION:</u> Sun contends this term does not require construction because the term is clear on its face. However, if the Court decides to construe this term, the term should be construed to mean: "a control signal transmitted to initiate a status response."</p> <p><u>EVIDENCE:</u></p> <ul style="list-style-type: none"> '984 patent: Col. 11: 14-56. Testimony by Sun's expert, Dr. Levy, concerning the meaning of this term to one of skill in the art in the context of its use in the '984 patent. Sun reserves the right to rely on any evidence identified by NetApp.